

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:

THE GATEWAY VENTURES, LLC,
Debtor.

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Case No. 21-30071

**MOTION FOR EXPEDITED CONSIDERATION REGARDING MOTION
OF WEYCER, KAPLAN, PULASKI & ZUBER, P.C. TO WITHDRAW AS
COUNSEL FOR DEBTOR (RE: DOCKET NO. 7)**

TO THE HONORABLE H. CHRISTOPHER MOTT, U.S. BANKRUPTCY JUDGE:

Weycer, Kaplan, Pulaski & Zuber, P.C., proposed counsel to the Debtor and Debtor in Possession (“WKPZ”), files this *Motion for Expedited Consideration Regarding Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* and in support thereof would show the Court the following.

1. **Underlying motion.** *Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* (Docket No. 7) filed contemporaneously herewith.

2. **Basis for expedited consideration.** Expedited consideration of the subject motion is necessary to clarify the representation of the Debtor in this case as critical deadlines approach and otherwise with respect to the normal fiduciary duties of the Debtor as Debtor in Possession.

3. **Certificate of Conference.** The undersigned supplied a draft of this Motion to Mr. Michael Dixon, the principal of the Debtor and/or the of the manager of the Debtor, on February 3, 2021 by email and attachments, text (SMS) message and attachments, and Federal Express overnight delivery (which delivery was unsuccessful on February 4, 2021 per messages

from Federal Express to the undersigned). The undersigned briefly spoke with Mr. Dixon by telephone on February 3, 2021 and February 4, 2021. Mr. Dixon has not indicated that this Motion is opposed or unopposed.

4. **Time estimate for hearing.** Fifteen (15) minutes.

5. **Deadline for when hearing is needed:** A hearing is needed by February 9, 2021 or February 10, 2021 in order to provide the Debtor with as much time as possible to secure other representation and address critical deadlines in this case.

6. **Date when all parties are available:** The undersigned is available the entirety of February 9, 2021 and February 10, 2021.

7. A proposed form of order accompanies this motion.

Dated: February 5, 2021

Respectfully submitted:

WEYCER, KAPLAN, PULASKI & ZUBER, P.C.

By: /s/ Jeff Carruth
JEFF CARRUTH (TX SBN:. 24001846)
3030 Matlock Rd., Suite 201
Arlington, Texas 76105
Telephone: (713) 341-1158
Fax: (866) 666-5322
E-mail: jcarruth@wkpz.com

PROPOSED ATTORNEYS FOR
THE GATEWAY VENTURES, LLC

CERTIFICATE OF CONFERENCE

The undersigned supplied a draft of this Motion to Mr. Michael Dixon, the principal of the Debtor and/or the of the manager of the Debtor, on February 3, 2021 by email and attachments, text (SMS) message and attachments, and Federal Express overnight delivery (which delivery was unsuccessful on February 4, 2021 per messages from Federal Express to the undersigned). The undersigned briefly spoke with Mr. Dixon by telephone on February 3, 2021 and February 4, 2021. Mr. Dixon has not indicated that this Motion is opposed or unopposed.

/s/ Jeff Carruth

JEFF CARRUTH

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on February 5, 2021 (1) by electronic notice to all ECF users who have appeared in this case to date, as set forth below and (2) by regular mail to all parties appearing in the attached address list (i.e. mailing matrix) obtained from the Court's PACER facility as attached below. Additional service was made by email and text (SMS) message, with attachments, to the Debtor through Mr. Michael Dixon, and by Federal Express to the Debtor at the address shown on the mailing list below.

/s/ Jeff Carruth

JEFF CARRUTH

ECF SERVICE LIST

21-30071-hcm Notice will be electronically mailed to:

Jeff Carruth on behalf of Debtor The Gateway Ventures, LLC
jcarruth@wkpz.com, jcarruth@aol.com; ATTY_CARRUTH@trustesolutions.com

Harrel L. Davis, III on behalf of Creditor Suresh Kumar
hdavis@eplawyers.com, vrust@eplawyers.com; vpena@eplawyers.com

Clyde A. Pine, Jr. on behalf of Creditor HD Lending, LLC
pine@mgmsg.com, clyde.pine@gmail.com

United States Trustee - EP12
USTPRegion07.SN.ECF@usdoj.gov

Eric Charles Wood on behalf of Creditor Westar Investors Group, LLC
eric@brownfoxlaw.com, melissa@brownfoxlaw.com

Eric Charles Wood on behalf of Creditor Saleem Makani
eric@brownfoxlaw.com, melissa@brownfoxlaw.com

Eric Charles Wood on behalf of Creditor Suhail Bawa
eric@brownfoxlaw.com, melissa@brownfoxlaw.com

REGULAR MAIL LIST / MATRIX

Label Matrix for local noticing
0542-3
Case 21-30071-hcm
Western District of Texas
El Paso
Fri Feb 5 14:41:39 CST 2021

Ashish Nayyar
806 Rockport Lane
Allen, TX 75013

HD Lending LLC
6080 Surety Dr. Ste 101
El Paso, TX 79905-2066

Internal Revenue Service
Special Procedures Staff - Insolvency
P. O. Box 7346
Philadelphia, PA 19101-7346

PDG Prestige, Inc.
780 N. Resler Drive Suite B
El Paso, TX 79912-7196

Saleem Makani
c/o Eric Wood (Brown Fox)
8111 Preston Rd. Ste 300
Dallas, TX 75225-6329

Suresh Kumar
c/o Harrel Davis
PO Box 1322
El Paso, TX 79947-1322

Westar Investor Group LLC
c/o Eric Wood (Brown Fox)
8111 Preston Rd. Ste 300
Dallas, TX 75225-6329

End of Label Matrix
Mailable recipients 23
Bypassed recipients 0
Total 23

The Gateway Ventures, LLC
c/o PDG Prestige, Inc.
780 N Resler Drive, Suite B
El Paso, TX 79912-7196

Depcesh Shrestha
3708 N. White Chapel Blvd.
Southlake, TX 76092-2042

HD Lending LLC
c/o Stephen H. Nickey PC
1201 North Mesa Ste. B
El Paso, TX 79902-4000

Marty D. Price
2514 Boll St.
Dalals, TX 75204-2512

Rahim Noorani
4312 Hopi Drive
Carrollton, TX 75010-1133

Suhail Bawa
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Brown Fox PLLC
5550 Granite Parkway, Suite 175
Plano, Texas 75024
Email: eric@brownfoxlaw.com 75024-3834

Umesh Shrestha
8505 Revenue Way
North Richland Hills, TX 76182-7431

Westar Investors Group, LLC
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Brown Fox PLLC
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Plano, Texas 75024
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U.S. BANKRUPTCY COURT
511 E. San Antonio Ave., Rm. 444
EL PASO, TX 79901-2417

El Paso County Tax AC
301 Manny Martinez Dr., 1st Floor
El Paso, TX 79905-5503

HD Lending, LLC
c/o Clyde A. Pine, Jr.
Mounce Green Myers
P.O. Box 1977
El Paso, Texas 79999-1977

Michael Dixon
780 N. Resler Drive Suite B
El Paso, TX 79912-7196

Saleem Makani
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Brown Fox PLLC
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Suhail Bawa
c/o Eric Wood (Brown Fox)
8111 Preston Rd. Ste 300
Dallas, TX 75225-6329

United States Trustee - EP12
U.S. Trustee's Office
615 E. Houston, Suite 533
P.O. Box 1539
San Antonio, TX 78295-1539

Jeff Carruth
Weycer Kaplan Pulaski & Zuber, P.C.
25 Greenway Plaza, #2050
Houston, TX 77046

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:

THE GATEWAY VENTURES, LLC,

Debtor.

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Case No. 21-30071

**ORDER GRANTING MOTION FOR EXPEDITED CONSIDERATION
REGARDING MOTION OF WEYCER, KAPLAN, PULASKI & ZUBER,
P.C. TO WITHDRAW AS COUNSEL FOR DEBTOR (RE: DOCKET
NO. 8)**

On this day came on for consideration *Motion For Expedited Consideration Regarding Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* (Docket No. 8) (the “Motion to Expedite”) regarding the *Motion of Weycer, Kaplan, Pulaski & Zuber, P.C. to Withdraw as Counsel for Debtor* (Docket No. 7) (the “Motion to Withdraw”) filed herein on February 5, 2021 by *Weycer, Kaplan, Pulaski & Zuber, P.C.* The Court finds and concludes that the Motion to Expedite should be granted.

IT IS THEREFORE ORDERED THAT the Court shall conduct an expedited hearing on the Motion to Withdraw at the date and time entered on the docket for this case. Movant shall be responsible for notice.

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